

# **Department of Energy**

Germantown, MD 20874-1290

Professor Leonid A. Bolshov Director Nuclear Safety Institute Russian Academy of Sciences B. Tulskaya, 52 Moscow, 113191 Russia Dear Dr. Bolshov:

I hope you have had an enjoyable summer. It has been some time since we corresponded, and I thought I would update you on the status of various Department of Energy (DOE)-supported Joint Coordinating Committee for Radiation Effects Research (JCCRER) activities.

### **Microfilming Effort:**

The microfilming equipment was shipped on August 27, 1997, to the International Science and Technology Center (ISTC) in Moscow, and Dr. Alexander Loukashov of MAYAK has arranged to pick up the equipment there and deliver it to MAYAK. While the equipment will be set up at MAYAK, it will be used to film both MAYAK and FIB-1 records. Elly Melamed, the DOE lead for the microfilming effort, is scheduled to depart for Ozersk on September 27, 1997. She will be accompanied by several microfilming experts who will spend about a month training MAYAK and FIB-1 staff on the use of the equipment and providing technical assistance to begin the effort.

Within the next few months, we intend to ship additional microfilming equipment and funding for personnel responsible for the microfilming effort to URCRM through the Civilian Research and Defense Fund.

### **Communications Upgrade:**

I am very pleased with the plan you and your staff have put together for ensuring that each Executive Committee member, scientific institute director, and principal investigator has the computer equipment, software, e-mail, and internet access necessary to communicate with all JCCRER participants.

By October, MAYAK, FIB-1, and URCRM will have received DOE funding specifically for the purchase of computer equipment (as specified by the needs assessment your staff conducted). Once they have purchased and installed the equipment, IBRAE will work with them to ensure the appropriate software is provided.



I believe this upgrade is critical to the success of our joint JCCRER efforts, and I look forward to communicating directly with Russian Executive Committee members and principal investigators by e-mail and teleconference within the next few months.

### FY 1998 Funding for Ongoing Projects:

### Funding Levels:

We have provided \$150,000 to each of the scientific institutes for the first half of the fiscal year (October 1, 1997 - March 31, 1998) and are currently working with each to finalize the list of milestones and deliverables for this period. We assume that the institute directors also have been in communication with you about their budget requests and funding levels from DOE.

### Mechanisms for the Transfer of Funds:

The project agreement between DOE and the ISTC for the microfilming effort has just been signed. We plan to immediately begin to work with MAYAK and ISTC to put an agreement in place to use ISTC as the funds transfer mechanism for all DOE-funded work with MAYAK.

We do not think ISTC will be an option for IBRAE, FIB-1 and URCRM, as these institutes do not employ a high percentage of former weapons scientists. However, the Russian Government has recently enacted some legislation which should eliminate taxes paid on DOE funds sent to these institutes. We have enclosed an information package (in English and in Russian) for your review. We may need your help as we work with the U.S. Embassy and the institutes to get the Russian authorities' approval.

#### New Work:

We have been informed that proposals for Projects 1.3 and 2.4 will be submitted within the next few weeks. We hope to set up a meeting of the DOE Scientific Review Group in October 1997 and to initiate the joint work on those projects immediately their upon approval.

The Request for Proposals closes September 16, 1997, and an appointed review committee will meet in November in Washington, D.C., to review the proposals.

### **Data Access**:

As you may recall, the agreement signed by Dr. Tara O'Toole and Vice-Minister Sergei Khetagurov at the April JCCRER meeting included the commitment that "detailed procedures for access to data will become an Annex to this general policy statement."

Data access for DOE-funded projects was discussed in detail at a subsequent meeting between my staff and directors of URCRM, MAYAK, and FIB-1 in June. It was agreed that Russian and American principal investigators for each DOE-funded project would be charged with:

- 1) determining access needs and authorization for each project for:
  - o original, or raw data,
  - o compiled data created before the specific project began, and
  - o second generation data and information compiled according to project requirements;
- 2) developing a detailed agreement on data access for each project for signature by principal investigators and appropriate institute director(s) and Executive Committee members.

We have requested that American and Russian principal investigators together draw up these agreements before the next joint Executive Committee meeting, which we would like to hold in Moscow in early December 1997.

I look forward to seeing you soon. Please feel free to contact me any time on (301) 903-2476 or by e-mail at frank.hawkins@eh.doe.gov, or Libby White on (301) 903-7582 or by e-mail at elizabeth.white@eh.doe.gov.

Sincerely,

Frank Hawkins

Director

Office of International

Health Programs

### Enclosure

cc w/enclosure:

Lubov I. Anissimova, EMERCOM Michail F. Kisselev, MEDBIOEXTREM Alexandr P. Panfilov, MINATOM

### MINISTRY OF FINANCE OF THE RUSSIAN FEDERATION

### OFFICE OF THE MINISTER

9 Ilyinka St., Moscow 103097. Teletype: 112008.

Mr. V. G. Arryukhov

Fax: 925-0889

Chief of the State Tax Service of the Russian Federation

October 21, 1996 No. 04-00-11

23 Neglinnaya St., K-381 Moscow 103381

The Ministry of Finance of the Russian Federation considers that it is necessary to extend the suspension of taxes on the U.S. granutous assistance to the Russian economy until the passage of the law "On the Implementation of Amendments to Some Tax Laws of the Russian Federation and Privileges Related to Payments to Non-Budget State Funds in Connection with the Gratuitous Assistance Rendered to the Russian Federation by Foreign States and International Organizations". The order and condition of granting the tax deferral are provided for by the interim arrangement "On Granting a Tax Deferral in Connection with the Implementation of Gratuitous Assistance Programs by the U.S. Government" of April 17, 1996, between the Ministry of Finance of the Russian Federation and the Embassy of the United States of America.

In this connection, I request you give urgent instructions to state tax inspections in the constituent members of the Russian Federation concerning the extension of the effect of Letter # VP-6-06/363 of May 17, 1996, titled "On Granting Tax Deferrals in Connection with the Implementation of U.S. Government Assistance Programs."

- signed -

A. Ya. LIVSHITS

#### AGREEMENT

On the Implementation of Tax Postponements under the Gratuitous Assistance Rendered to the Russian Federation by the United States Government

In order to ensure that transactions paid for with United States Government assistance funds are not subject to taxes or duties in the Russian Federation, and pursuant to Resolution No. KA-H8-05119 of the Government of the Russian Federation, of February 28, 1996, the present Agreements is signed on the conditions and terms of the implementation of tax and duty postponements under the gratuitous assistance rendered to the Russian Federation by the United States Government (hereinafter referred to as assistance).

The present Agreement will be sufficient to postpone any tax and duty payments under assistance programs according to its terms and without referral to any additional procedures and approvals until the provisions of the Federal Law On the Implementation of Amendments to Some Tax Laws of the Russian Federation regulating the issues of taxation concerning the foreign assistance programs, are effective, but not more than for six months after the present Agreement is signed.

The Parties have concluded the present Agreement for the following:

- 1: For the period specified above, the following tax and duty payments under assistance programs are to be postponed:
  - Profits Tax, for enterprises and organizations which pay the tax according to the laws of the Russian Federation, in respect of profits received through the direct implementation of assistance specified above, and subject to the condition that the said enterprises and organizations provide to the Tax Organ a certificate in the format specified in Attachment # 1 to the present Agreement;
    - Value Added Tax, to exempt funds, goods, materials, other property and services received through assistance, from the taxable turnover, and subject to the condition that the said enterprises and organizations receiving the funds provide to the Tax (Customs) Organ a certificate in the format specified in Attachment # 2 to the present Agreement;
    - Value Added Tax, in respect of imported or domestic purchased goods (works and services) paid for with foreign assistance funds, subject to the condition that enterprises and organizations receiving funds provide to the Tax Organ (the Customs Committee in the case of imports) a certificate in the format specified in Attachment # 2 to the present Agreement:

## **Compensation Program**

As in previous years, all awards of compensation made during 1996 were for personal injuries, specifically medical conditions identified by Tribunal regulation as administratively presumed to be the result of the United States Nuclear Testing Program. Originally adopted in 1991, the Tribunal's compensable medical condition regulations were amended during 1996 to increase the number of illnesses for which a causal relationship to the nuclear testing program is presumed from 27 to 34 (see Attachment 1, page 18).

Those 34 conditions have been adopted based on documented scientific and medical research findings about the effects of radiation on humans and on established precedents in statutes and regulations entitling U.S. citizens to compensation for conditions presumed to result from radiation exposure.

The Tribunal's presumptive program meets the need for an efficient, simple and cost-effective system of resolving personal injury claims where proof of causation would be impossible given the fact that exposure level data from throughout the Marshall Islands during the testing program is not available. The failure of the U.S. to provide exposure data during the testing, the lack of advanced medical diagnostic capabilities provided by the U.S. as administering authority both during and after the testing, and the absence of baseline non-radiation risk factors for Marshallese combine to make the Tribunal's approach both reasonable and fair.

# Comparability With U.S. Compensation Programs

It should also be noted that the Tribunal's presumptive approach is closely patterned after similar U.S. statutory programs providing compensation for American civilian and military personnel.

In 1988, the U.S. Congress adopted Public Law 100-321, the Radiation-Exposed Veterans Compensation Act, "to provide a presumption of service connection" for 13 specific medical diseases to veterans "who participated in atmospheric or underwater nuclear tests as part of the United States nuclear weapons testing program."

In Public Law 101-426, the Radiation Exposure Compensation Act of 1990 (often referred to as the "Downwinders' Act), the Congress found that fallout

2. The postponement shall be granted in respect of the taxes to be collected for the entire period from the beginning through the completion of the implementation of programs, which are being currently implemented or have been started prior to this postponement is granted.

If a different taxation regime was applied earlier under the implementation of the assistance, the recalculation of surplus sums of taxes and fees paid, as well as the reimbursement of fines imposed according to the results of inspections conducted by control bodies, shall not be made. Taxes and duties to be paid pursuant to the previous laws, which have not been paid until the time the postponement is granted, and the fines related to them, shall not be paid.

3. A Certificate drawn in the Russian language in the format attached to the present Agreement, specifying the amounts paid to the given enterprise, organization or person from the US assistance funds allocated for the provision of assistance to the Russian Federation through relevant assistance programs, issued by the United States Embassy for enterprises, organizations or persons, and which is to be provided to Tax or Customs Committee, will be sufficient to obtain the tax and duty postponement, specified in Paragraph 1 of the present Agreement.

FOR THE RUSSIAN FEDERATION FOR THE UNITED STATES OF AMERICA

Russian Federation Minister of Finance. United States Ambassador

- signed -

V. G. PANSKOV

THOMAS R. PICKERING

THE GREAT SEAL

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April \_\_\_\_\_\_ 1996

### UNOFFICIAL TRANSLATION

Ministry of Finance of the Russian Federation 103097 Moscow Ilyinka, 9

No. 04-06-02/2

April 28, 1997

A.P. Pochinok
Head
State Tax Service
of the Russian Federation
103301 Moscow K-381
Neglinnaya, 23

Dear Alexander Petrovich:

State Tax Service of the Russian Federation (V D Yevenigneyev) sent a letter of Moreh 22, 1997 No. 06-3-06/25 to the Government of the Russian Federation with the request to charge the Ministery of Finance of the Russian Federation to solve without delay the issue of postponentum for payments into the budget under the gratuitous assistance rendered to Russia by the U.S. Government.

This issue was solved by the special Agreement between the Ministry of Finance of the Russian Federation and the United States Embassy of April 17, 1996, which was concluded for the period until the Russian federal law on privileges in taxation and other payments into the budget during transactions under the granuitous foreign assistance to the Russian economy is passed, but then it was suspended in connection with the expiration of the six-month period of its validity and in connection with the fact that the above mentioned law was not considered by the Federal Assembly during the year of 1996.

Taking into consideration that the above mentioned law will be considered by the State Duma in the near future, bearing in mind that we receive many request applications from the American political and business circles on this matter, and taking into account the above mentioned letter of the State Tax Service, the Ministry of Finance of the Russian Federation believed it was necessary to extend operation of the Agreement with the U.S. Embassy of April 17, 1996 until the corresponding law is passed.

I request you to notify tax services about this and ensure adherence to provisions of the above

I ask you to inform me about taken measures.

A.B. Chubais (signature)

#### UNOFFICIAL TRANSLATION

Ministry of Finance of the Russian Federation 103097 Moscow Ilyinka, 9

No. 04-06-02/2

April 28, 1997

A.S. Kruglov
Chairman
State Custom Committee
of the Russian Federation
107842 Moscow
Komeomelskeya Pleshehad, 1a

Dear Anaroly Sergeyevich:

State Tax Service of the Russian Federation (V.D. Yevstigneyev) sent a letter of March 28, 1997 No. 06-3-06/25 to the Government of the Russian Federation with the request to charge the Ministry of Finance of the Russian Federation to solve without delay the issue of postponement for payments into the budget under the granuitous assistance rendered to Russia by the U.S. Government.

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I ask you to inform me about taken measures.

A.B. Clubais (signature)

initial payment was made in the amount of 20%. Subsequently, annual pro rata payments have been made every October as follows: 5% in 1991, 8% in 1992, 7% in 1993, 10% in 1994, and 5% in 1995.

For each new award made after October 1991, an initial payment was made in the amount of the accumulated percentage received by previous awardees. Thus, awards made from November 1991 to October 1992 were paid at 25%, awards from November 1992 to October 1993 were paid at 33% and so on.

For 1996, the annual payment rate was set at 2% of each award, bringing the cumulative payout to 57%. In a Statement of Determination issued on September 30, 1996 (see Attachment 5, pages 25-26), the Tribunal noted that a cornerstone of its payment policy has been "balancing of the interests of existing recipients to receive as much of their awards as possible with the interests of future recipients to be treated fairly and equitably."

That statement also noted that the reserve of unexpended annual funds built up during the early years of the Tribunal had been almost exhausted and that for the first time since payments began in August 1991, the Tribunal is faced with the very real possibility that anticipated payments against awards will exceed the amount available during the year. The statement notes that the expected "shortage of funds suggests there should be no annual payment at all this year" but also recognizes that "it would be unreasonable to completely stop annual payments on such short notice." Accordingly, a pro rata annual payment of 2% was determined to be proper and reasonable.

That action brought the total cumulative payment to 57% for all awards made through September 30, 1996. The statement also notes, however, that "this determination puts recipients on notice that this payment will be the last received until new recipients of awards are brought up to a level equal to that received by current awardees."

In addition to addressing the issue of the 1996 annual pro rata payment, the September 30th determination of the Tribunal also established that the appropriate initial payment rate for awards made after that date shall be 25%. In making that determination, the Tribunal noted that its action to add the seven new presumed medical conditions, effective October 1, 1996, may result in as much as \$17.5 million in personal injury awards during the coming year, making it impossible to continue to make initial payments on new awards at

# The United State Letterhead

This letter is to certify that United States assistance funds will be paid to [
Pursuant to an agreement between the Ministry of Finance of the Russian Federation and the United States Embassy. Moscow, this certification shall be sufficient to exempt the organization named above from any profits taxes on United States assistance funds allocated to render assistance to the Russian Federation.
[Total payments to the organization or enterprise named above from United States assistance runds which were paid or which are to be paid in the period the postponement is effective, are S]
FOR THE EMBASSY OF THE UNITED STATES OF AMERICA IN MOSCOW
Robin Copeland Office Director Seal
Date

# The United State Embassy Letterhead

This letter is to certify that [
Pursuant to an agreement between the Ministry of Finance of the Russian Federation and the United States Embassy, Moscow, this certification shall be sufficient to exempt the organization named above from any value added tax, excise tax and customs duties at the place and time of purchase or import.
[Total payments for transaction which were paid or which are to be paid in the period the postponement is effective, are \$]
Description of transaction:
Approximate time frame for transaction:
FOR THE EMBASSY OF THE UNITED STATES OF AMERICA IN MOSCOW
Robin Copeland Office Director Seal
Date

The United State Embassy Letterhead

This letter is to certify that [
Pursuant to an agreement between the Ministry of Finance of the Russian Federation and the United States Embassy. Moscow, this certification shall be sufficient to exempt the organization named above from any property taxes or vehicle purchase and ownership taxes for the period of time indicated below.
[Total payments for transaction which were paid or which are to be paid in the period the postponement is effective. are \$]
Description of property:
Approximate time frame for transaction:
FOR THE EMBASSY OF THE UNITED STATES OF AMERICA IN MOSCOW
Robin Copeiand Office Director Seal
Date

The	United	State	Embassy	Letterhead
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This letter is to certify that [
Pursuant to an agreement between the Ministry of Finance of the Russian Federation and the United States Embassy, Moscow, this certification shall be sufficient to exempt the individual named above from any individual income tax in the current calendar year.
FOR THE EMBASSY OF THE UNITED STATES OF AMERICA IN MOSCOW
Robin Copeland Office Director Seal
Date

Настоящим удостоверяется. что получит средства из фондов, выделенных Правительством Соединённых Штатов Америки в целях реализации прграммы помощи Российской Федерации в соответствии с положениями Соглашения между Правительством Соединённых Штатов Америки и Правительством Российской Федерации о сотрудничестве по облегчению оказания содействия от 4 апреля 1992 года, подписанного Координатором программ помощи США странам СНГ Ричардом К. Армитаджем и заместителем премьера Правительства Российской Федерации Александром Шохиным.
В соответствии с соглашением между Министерством финансов Российской Федерации и Посольством Соединенных Штатов Америки в Москве настоящий сертификат является необходимым и достаточным основанием для освобождения указанной выше организации от уплаты любых налогов на прибыль из фондов, выделенных Правительством США для оказания помощи Российской Федерации.
(Сумма всех средств, которые уже выплачены или предполагается выплатить вышеуказанному предприятию или организации на период предоставления отсрочки, составила \$)
ОТ ИМЕНИ ПОСОЛЬСТВА СОЕДИНЁННЫХ ШТАТОВ АМЕРИКИ В МОСКВЕ
Робин Коуплэнд Директор Офиса
Дата

Настоящим удостоверяется, что	ыделенных Правительством ия помощи Российской Федерации в лённой Соглашением между рики и Правительством Российской оказания содействия от 4 апреля рограмм помощи США странам СНГ
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Время осуществления операции:	
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Робин Коуплэнд Директор Офиса	
Дата	

(Attachment # 3)

Настоящим удостоверяется, что получил описываемое ниже имущество для целей реализации программы оказания помощи за счёт
средств, выделенных Правительством Соединенных Штатов Америки для
оказания такой помощи Российской Федерации в соответствии с положениями
Соглашения между Правительством Соединённых Штатов Америки и Правительством Российской Федерации о сотрудничестве по облегчению
оказания содействия от 4 апреля 1992 года, подписанного Координатором
программ помощи США странам СНГ Ричардом К. Армитаджем и заместителем премьера Правительства Российской Федерации Александром Шохиным.
В соответствии с соглашением между Министерством финансов Российской
Федерации и Посольством Соединенных Штатов Америки в Москве настоящий сертификат является необходимым и достаточным основанием для
освобождения указанной выше организации от уплаты налога на имущество
предприятий, налога с владельцев транспортных средств и на преобретение
автотранспортных средств в течение периода времени, указанного ниже.
(Сумма всех средств, которые уже выплачены или предполагается
выплатить на период предоставления отсрочки, составила \$)
от имени посольства
СОЕДИНЁННЫХ ШТАТОВ АМЕРИКИ В МОСКВЕ
Робин Коуплэнд
Директор Офиса
Дата
дата

(Attachment # 4)

Настоящим удостоверяется, что получиз	т в текущем году
заработную плату в размере S за счёт фондов,	
Правительством Соединённых Штатов Америки для оказания	и помощи
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Правительством Соединённых Штатов Америки и Правитель	
Федерации о сотрудничестве по облегчению оказания содейст	
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Ричардом К. Армитаджем и заместителем премьера Правите.	льства Российской
Федерации Александром Шохиным.	
В соответствии с соглашением между Министерством финанс Федерации и Посольством Соединённых Штатов Америки в в сертификат является необходимым и достаточным основание освобождения указанного выше физического лица от уплаты налога в течение текущего календарного года.	Москве настоящий м для
ОТ ИМЕНИ ПОСОЛЬСТВА СОЕДИНЁННЫХ ШТАТОВ АМЕРИКИ В МОСКВЕ	
Робин Коуплэнд	
Директор Офиса	
Worksone - A	
Дата	

#### СОГЛАШЕНИЕ

на предоставление отсрочки по уплате налогов, в связи программ помощи, оказываемой Российской Федерации на безвозмездной основе правительством Соединенных Штатов Америки

В целях обеспечения того, чтобы операции, оплачиваемые выделенных Правительством США на оказание программ помощи, не облагались налогами и пошлинами в Российской Федерации. исполнение решения Правительства Российской Федерации от 28 февраля 1995 г. N КД-П8-06119 , подписано настоящее соглашение о следующих условиях и сроках предоставления отсрочки по уплате налогов и с реализацией программ пошлин. в связи помощи, оказываемой Российской Федерации безвозмездной основе правительством на Соединенных Штатов Америки (далее - "помощи").

Настоящее соглашение является основанием для предоставления отсрочки по уплате налогов и пошлин, в связи с реализацией программ помощи в соответствии с предусмотренными в нем условиями и без каких-либо дополнительных процедур и согласований, на период до вступления в силу положений федерального закона о внесении изменений и дополнений в отдельные законы Российской Федерации о налогах, регулирующих вопросы налогообложения в связи с реализацией программ иностранной помощи, но не более чем на шесть месяцев со дня подписания настоящего соглашения.

### Стороны заключили настоящее соглашение в нижеследующем:

- 1. На период, оговоренный выше предоставляется отсрочка по уплате следующих налогов и пошлин, в связи с реализацией программ помощи:
- по налогу на прибыль, для предприятий и организаций, являющихся плательщиками этого налога в соответствии с законодательством Российской Федерации, в части прибыли, полученной в результате непосредственного осуществления помощи, указанной выше, при условии предоставления указанными предприятиями и организациями в налоговый орган сертификата по форме приложения N 1 к настоящему соглашению;

oct as an adviser to the Receiver. The Receiver made a special distribution in Jecember to replace the missed October distribution.

NCT No. 25-006: Defender of the Fund, Complainant, vs. Rongelap LDA and NCT No. 27-001: Johnsay Riklon, et al., Complainants, vs. Rongelap LDA - In 1995 the parties adopted and the Special Tribunal approved a financial plan calling for the LDA to submit a financial report within a year's time detailing distribution of quarterly payments for fiscal years 1992 and 1993. The LDA was to address separately the expenditure of certain funds from earlier years. In March the Defender met with the LDA to review progress towards completion of the final report.

In April the Defender and the LDA reviewed a progress report submitted by the LDA. It was agreed and approved by the Special Tribunal that the final report be completed by July. Having failed to produce the final report in July, but having compiled much of the information for the report, the Special Tribunal in August ordered that the LDA submit its distribution report for fiscal years 1992 and 1993 in September and report on the use of Rongelap Claims Trust Fund income and the quarterly drawdowns of \$20,000 for those ears as well as the expenditure of the 3% invasion of the trust corpus in 1990 and other requirements of the plan by November.

In September the LDA responded to the Special Tribunal order and reported on the October, 1991 and January, 1992 quarterly distribution, recipients of those distributions and summarized distributions received from custodian of the funds for the distribution payments. Additionally, the LDA reported they could not verify the distribution to individual recipients due to a lack of records. In November the LDA delivered its report to the Defender of the Fund indicating that certain drawdowns of funds were for a specific purpose while others could only be identified through canceled check. However, the LDA could not obtain copies of the checks. Thus, while the report gives an indication of receivables and expenditures, many of the details necessary to account for all the funds remain outstanding. Under these circumstances the Defender of the Fund will bring the matter before the Special Tribunal for further action.

- по этчислениям на содержание дорог, для предприятий и организаций, ответственных за непосредственное осуществление помощи, при условии предоставления предприятиями и организациями, получающими указанные средства в налоговый орган сертификата по форме приложения N 3 к настоящему соглашению;
- по налогу с владельцев транспортных средств и на приобретение автотранспортных средств, по предприятиям и организациям, имеющим в собственности или приобретающим такие средства, предназначенные для использования при непосредственном осуществлении помощи, при условии предоставления предприятиями и организациями, располагающими такими средствами в налоговый орган сертификата сертификата по форме приложения N 3 к настоящему соглашению:
- по таможенным пошлинам, в отношении товаров, материалов и другого имущества, ввозимого на таможенную территорию Российской Федерации в качестве иностранной помощи, a Takxe непосредственного осуществления такой помощи, при **УС** ЛОВИИ организациями, ввозящими такое предоставления предприятиями И имущество, в таможенный орган при ввозе имущества сертификата по форме приложения N 3 к настоящему соглашению.
- 2. Настоящая отсрочка предоставляется по налогам, подлежащим уплате за весь период с начала и до завершения реализации ранее начатых и реализуемых на момент предоставления отсрочки программ помощи.
- В случаях, когда в процессе осуществления помощи применялся иной налоговый режим. Перерасчет сумм излишне уплаченных налогов и пошлин, равно как и возврат уже взысканных штрафных санкций, предъявленных по результатам проверок контролирующих органов, не производится. Налоги и пошлины, подлежавшие уплате в соответствии с ранее действовавшим законодательством и не уплаченные на момент предоставления отсрочки в соответствии с настоящим соглашением, а также штрафные санкции по ним уплате не подлежат.
- 3. Необходимым и достаточным условием для получения отсрочки уплаты налогов и сборов в соответствии с пунктом 1 настоящего соглашения является предъявление предприятиями, организациями и физическими лицами в налоговый или таможенный орган сертификатов (составленных на русском языке), выдаваемых им посольством США с указанием в нах суммы средств, выплаченных данному предприятию, организации или физическому лицу за счет фондов правительства США,

выделенных для оказания помощи Российской Федерации в рамках соответствующей программы помощи, по формам в соответствии с приложениями к настоящему соглашению.

Мини<u>стр</u>финансов

В.Г. Пансков

<u>17</u> апреля 1996 г.

Посол Соединенных Штатов

TOMAC P. TE

### ПРИЛОЖЕНИЕ 1

Официальный бланк Посольства Соединенных Штатов Америки

Дата	····				
Имя, должнос	ть	ne:	ЧАТЬ		
ОТ ИМЕНИ ПОС ШТАТОВ АМЕРИ	ОЛЬСТВА ССЕДИНЕ КИ В МОСКВЕ	HHEIX			
<b>выплат</b> ить в	всех средств, ышеуказанному ия отсрочки, со	предприятию	или орган	ьн иирьси	
Российской б Москве наст основанием любых налого	ветствии с с Федерации и По оящий сертифик для освобождени в на прибыль и помощи Российс	сольством Со ат является я указанной в фондов,	оединенных необходим выше орга выделенных	А вот <mark>ьтш</mark> сод и мы соц	мерики в гаточным г уплаты
предприятия, правительств соответствии	тастоящим у организации) ом США для о с программой п даты и ответс ой помощи)	получит сре казания поме омощи (	едства из ощи Россий названи	фондов, выд ской Федер е программы	деленных в иирьс ишомоп ы
	TO CIONWINI T	AUC, UDEDNEIL.	א. אוט נ		laspanne

# Официальный бланк Посольства Соединенных Штатов Америки

ŀ	<b>laстоящим</b>	удосто	веряется	, 410	(	название
предприятия,	организаці	ии или	имя фі	изическо	го лица)	выполняет
описываемую	ниже операг	цию со	средст	вами ва	фондов,	выделенных
правительство	ом США для	оказан	OMOD RNH	щи Росс	ийской Ф	<sup>)</sup> едерации в
соответствии	с программо	ишомоп й	1 (	. назва	ние прогр	аммы помощи
с указанием д	цаты и отв	етствень	ных лиц,	подпис	авших со	глашение об
оказании тако	и помощи)					
	зетствии с					
Российской Ф						
Москве насто						
основанием Д						
налога на доб	_	-	акциза	и таможе	нных пошл	чин во время
и на месте по	ок <b>упк</b> и или в	воза.				
( C		_			<b>.</b>	
	всех средст					
выплатить по	операции на	период	предоста	вления о	тсрочки,	составила 3
	)					
Описание опер	рации:	- · · · · · · · · · · · · · · · · · · ·	<del></del>			
Время осущест	гвления опер	ации:				
	<b></b>					
от имени посо		иненных				
ШТАТСВ АМЕРИН	(N R WOCKRE					
Имя, должност						
THOM, AUTAMOC			ПЕЧ	АТЬ		
				-		
Дата						

# Официальный бланк Посольства Соединенных Штатов Америки

Настоящим удостоверяется, что (название
предприятия, организации или имя физического лица) получил
описываемое ниже имущество для целей реализации программы оказания
помощи за счет средств, выделенных правительством США для оказания
гакой помощи Российской Федерации в соответствии с программой помощи
название программы помощи с указанием даты и
этветственных лиц, подписавших соглашение об оказании такой помощи)
В соответствии с соглашением между Министерством финансов
Российской Федерации и Посольством Соединенных штатов Америки в
Москве настоящий сертификат является необходимым и достаточным
основанием для освобождения указанной выше организации от уплаты
налога на имущество предприятий, налога с владельцев транспортных
средств и на приобретение автотранспортных средств в течение
периода времени, указанного ниже.
16
(Сумма всех средств, которые уже выплачены или предполагается
выплатить по операции на период предоставления отсрочки, составила \$
Описание имущества:
Время осуществления операции:
ОТ ИМЕНИ ПОСОЛЬСТВА СОЕДИНЕННЫХ
WTATOB AMEPUKU B MOCKBE
ELATOR WILL WAN R HOOKE
Имя, должность
ПЕЧАТЬ
<u> Aara</u>

### ПРИЛОЖЕНИЕ 4

Официальный бланк Посольства Соединенных Штатов Америки

Настоящим удостоверяется, что (.....имя физического лица) получил в текущем году заработную плату в размере \$\_\_\_\_\_\_\_ за счет фондов, выделенных правительством США для оказания помощи Российской Федерации в соответствии с программой помощи (..... название программы помощи с указанием даты и ответственных лиц, подписавших соглашение об оказании такой помощи)

В соответствии с соглашением между Министерством финансов Российской Федерации и Посольством Соединенных штатов Америки в Москве настоящий сертификат является необходимым и достаточным основанием для освобождения указанного выше физического лица от уплаты подоходного налога в течение текущего календарного года.

**ОТ ИМЕНИ ПОСО**ЛЬСТВА СОЕДИНЕННЫХ **ШТА**ТОВ АМЕРИКИ В МОСКВЕ

Имя, должность

Дата

ПЕЧАТЬ